

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

**CHILDREN’S HEALTH DEFENSE, *et al.*,**

**Plaintiffs,**

**vs.**

**WP COMPANY D/B/A WASHINGTON  
POST, *et al.*,**

**Defendants.**

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**CASE NO. 2:23-cv-004-Z**

**DECLARATION OF JOHN DANISZEWSKI**

I, John Daniszewski, declare and state the facts I set forth in this declaration are based on my personal knowledge. If called upon as a witness, I would testify to these facts competently under oath.

1. I submit this declaration in support of Defendants’ Motion to Transfer in the above-captioned matter.

2. I am employed by The Associated Press (“The AP”) as the Vice President and Editor at Large for Standards at The AP. I have been in this position since July 2016.

3. The AP is a not-for-profit news cooperative dedicated to factual reporting. The AP maintains news bureaus throughout the world. For over 170 years, The AP has provided quality reporting to the American public and beyond.

4. The AP is incorporated in New York State. The AP’s primary place of business is its headquarters located at 200 Liberty Street, New York, NY. The AP’s management and its primary newsroom are also located at its headquarters in New York, NY.

5. The AP also has an office in Washington, DC.

6. I am based out of The AP's New York, NY office. I reside in New York State, less than 100 miles from the Southern District of New York federal courthouse in New York, NY.

7. I am familiar with the Trusted News Initiative ("TNI"), which was organized by the British Broadcasting Corporation ("BBC") as a co-operative framework for news publishers and others to identify and quickly alert others to severe and potentially harmful disinformation.

8. The AP was not a founding member of the TNI but began participating in meetings and communications relating to the TNI at the BBC's invitation in 2020. To the best of my knowledge, The AP's decision to participate in the TNI was made by The AP's management located in New York, NY.

9. The AP's participation in the TNI has been limited to exchanging emails as well as participating in calls and annual summits. The 2021 and 2022 annual summits were held virtually. The 2023 summit was held virtually, with some in-person sessions in London.

10. I am one of only two AP employees who have regularly participated in TNI meetings and related communications. The only other AP employee who has regularly participated in TNI meetings and related communication is Barbara Whitaker.

11. Ms. Whitaker is the New York Editor, Fact Check Desk at The AP. She is also based out of The AP's New York, NY office. She resides in Connecticut, less than 100 miles from the Southern District of New York federal courthouse in New York, NY.

12. The two most knowledgeable witnesses regarding The AP's participation in the TNI are thus both located in and around New York, NY.

13. I store any documents I have relating to TNI either electronically or at The AP's New York, NY office. To the best of my knowledge, Ms. Whitaker also stores any documents

she has relating to TNI either electronically or at The AP's New York, NY office. Thus, any documentary evidence The AP has relating to the TNI is located in New York, NY.

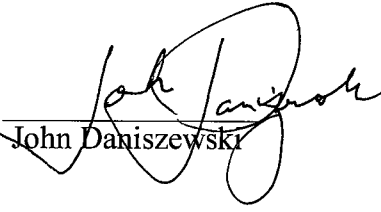
14. To the extent I attended any TNI meetings, I did so virtually from my office in New York, NY or from my residence in New York State. To the best of my knowledge, to the extent Ms. Whitaker attended any TNI meetings, she also did so virtually from her office in New York, NY or from her residence in Connecticut. Neither I, nor to the best of my knowledge Ms. Whitaker, ever attended a TNI meeting in person.

15. To the best of my knowledge, The AP has conducted no activities relating to the TNI in Texas, and no AP employee conducted any TNI activities from Texas.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 18, 2023

By:

  
John Daniszewski